

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Donna Streier,

Plaintiff,

v.

Enhanced Recovery Company, LLC

Defendant.

Court File No. 14-CV-3056 (JRT/HB)

**DECLARATION OF
SCOTT GALLAGHER**

I, Scott Gallagher, hereby declare the following statements to be true to the best of my knowledge and recollection:

1. I am an attorney for Defendant Enhanced Recovery Company, LLC (“ERC”) in the above-captioned matter. I have personal knowledge of the matters herein, and I am offering this declaration in support of ERC’s Motion to Extend Time to Answer.
2. My Jacksonville, Florida office was hired to represent ERC in this matter.
3. Upon being hired, I immediately sought to retain and retained local counsel in the District of Minnesota for ERC.
4. I contacted Plaintiff by email seeking consent to an enlargement of time in which to answer.
5. Plaintiff initially responded to this request by saying that she would get back to me to discuss possible resolution of the case, but did not answer the question about consenting to an extension, necessitating this motion.

6. Plaintiff later responded to my request for an extension of time and indicated her willingness to allow an extension and to discuss settlement, but Plaintiff has not yet agreed to a stipulation requesting that the Court order such an extension. ERC will continue to seek a stipulation after the filing of this motion.

I declare and verify under penalty of perjury that the foregoing is true and correct.

Executed on October 22, 2014.

s/ Scott Gallagher
Scott Gallagher